

### REMARKS

Applicant has carefully reviewed the application in light of the final Office Action dated February 5, 2008. For at least the reasons discussed below, Applicant respectfully requests reconsideration and favorable action in this case.

#### **Claim Rejections – 35 U.S.C. §103**

The Examiner rejects Claims 1-4 and 6-8 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,895,586 issued to Brasher et al., (hereinafter “*Brasher*”) in view of U.S. Patent No. 6,345,245 issued to Sugiyama et al., (hereinafter “*Sugiyama*”). Applicant respectfully traverses these rejections for the comments set forth below.

For example, independent claim 1 recites, “wherein the second computer has a message interpreter operable to parse both chains to provide identification of the target component with type and object as well as identification of the parent components with types and objects, wherein the identification includes translating information from the first natural language to a different natural language using both the chains.” For the teaching of this limitation, the Office Action merely offers the common dictionary management system disclosed in *Sugiyama*. But Applicants submit that the Office Action fails to consider each and every word of independent claim 1. “All words in a claim must be considered in judging the patentability of that claim against the prior art.” M.P.E.P. § 2143.03 (citing *In re Wilson*, 424 F.2d 1382, 165 U.S.P.Q. 494, 496 (C.C.P.A. 1970)). In judging the patentability of claim 1, the Office Action fails to consider at least the phrase “wherein the identification includes translating information from the first natural language to a different natural language using both the chains.” More particularly, the Office Action fails to consider that the translation from the first natural language to the second natural language uses both a hierarchy identifying types of components and a hierarchy that identifies components based on information associated with objects.

In particular, *Sugiyama* merely teaches that a common dictionary 1 is updated by a common dictionary management portion 2 in the event that edits are made to local user dictionaries. *Sugiyama*, Col. 5, lines 28-35; Summary of the Invention. In connection with updating the common dictionary, the common dictionary management portion 2 may update

other natural language processing systems such as word processing, machine translation, character recognition, abstract creation, voice recognition, and voice synthesizing. Claim 2. In doing so, dictionary edits executed by one natural language processing system "can be shared among specific natural language processing systems under predetermined conditions." Col. 6, lines 1-5. In other words, other processing system may be automatically updated with updated translation information. Applicant was unable to locate any passage in *Sugiyama* that teaches or suggest translating between two natural languages using both a type hierarchy and an object hierarchy. In fact, *Sugiyama* merely teaches a one-to-one translation between words.<sup>1</sup> Col. 8, lines 17-42.

In addition, the proposed *Brasher-Sugiyama* combination is improper because *Brasher* is not analogous art. The Examiner must determine what is analogous prior art for the purpose of analyzing the obviousness of the subject matter at issue. M.P.E.P. § 2141.01(a). "In order to rely on a reference as a basis for rejection of an applicant's invention, the reference must either be in the field of applicant's endeavor or, if not, then be reasonably pertinent to the particular problem with which the inventor was concerned." *In re Oetiker*, 977 F.2d 1443, 1446 (Fed. Cir. 1992). "A reference is reasonably pertinent if, even though it may be in a different field from that of the inventor's endeavor, it is one which because of the matter with which it deals, logically would have commended itself to an inventor's attention when considering his problem." *In re Clay*, 966 F.2d 656, 659 (Fed. Cir. 1992). *Brasher* is directed to computer management and, in particular, management of an enterprise computer system that may include heterogeneous computers. Since *Brasher* does not mention different natural languages, much less translating between different natural languages, *Brasher* is not in Applicant's field of endeavor nor would it have "commended itself" to Applicant when determining how to manage updates in a natural language processing system. A person of ordinary skill, seeking to translate between two different natural languages, would not reasonably be expected or motivated to look to managing different computer systems in an enterprise, of which *Brasher* is concerned.

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<sup>1</sup> Please note example of translation of Internet to the Japanese term Intahnetto.

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### CONCLUSION

Applicant has now made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicant respectfully requests full allowance of all Claims.

If the present application is not allowed and/or if one or more of the rejections is maintained, Applicant hereby requests a telephone conference with the Examiner and further requests that the Examiner contact the undersigned attorney to schedule the telephone conference.

No fees are believed to be due. However, please apply any deficiencies or any other required fees or any credits to deposit account 06-1050, referencing the attorney docket number shown above.

Respectfully submitted,

Date: May 5, 2008

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